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VIA ECF

Hon. Paul G. Gardephe
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: October 1, 2021

Re: *Converged Compliance Solutions, Inc. v. XOP Networks, Inc. et al.*, No. 21-CV-05482-PGG – Joint Request for Expansion of Page Limits on Defendants’ Motion to Dismiss

Dear Judge Gardephe:

We represent defendants XOP Networks, Inc. and Sudhir Gupta (together, “XOP”) in the above captioned case. Together with Plaintiff Converged Compliance Solutions, Inc. (“Plaintiff”) and Defendant David Harding (“Harding,” collectively with XOP, “Defendants”), we write to request an expansion of the page limits provided for in Rule IV.B of Your Honor’s Individual Rules in connection with Defendants’ anticipated combined motion to dismiss, as set forth below.

By order dated September 24, 2021, Your Honor granted XOP’s and Harding’s separate requests for leave to move to dismiss Plaintiff’s Amended Complaint. *See* ECF No. 34. The parties have met and conferred and agree that it would serve judicial economy for Defendants to submit a combined motion, rather than separate motions for Plaintiff to oppose and the Court to review. That said, to preserve Defendants’ ability to meaningfully address each of the Amended Complaint’s nineteen causes of action and Defendants’ individual defenses, the parties jointly request that the Court authorize the parties to file briefs comporting with the following page limits:

Defendants’ moving memorandum of law: 40 pages
Plaintiff’s memorandum of law in opposition: 40 pages
Defendants’ reply memorandum of law: 20 pages

The parties believe that this proposal will benefit all parties and the Court by allowing for the presentation of issues in a streamlined but substantive manner. We thank the Court for its continued attention to this matter and are available to discuss this request at the Court’s convenience.

September 28, 2021

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Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Jennifer A. Surprenant

Jennifer A. Surprenant
Keith Hammeran

CC: All Counsel of Record